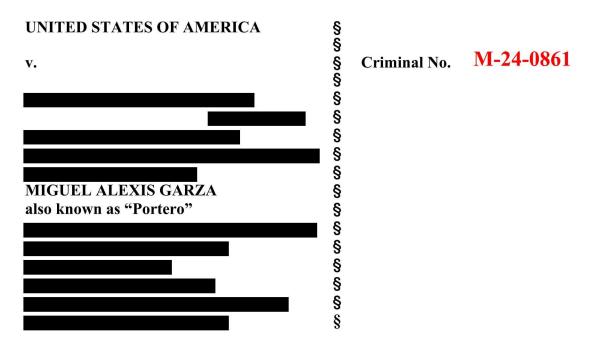
## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS McALLEN DIVISION



# **SEALED INDICTMENT**

#### THE GRAND JURY CHARGES:

## **Count One**

From at least July 2, 2021 and continuing through at least April 2, 2024 in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,



did knowingly combine, conspire, and agree with each other and with other persons known and

States Code, Section 554.

unknown to the grand jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956(a)(2)(A), to wit: to transport, transmit, transfer, or attempt to transport, transmit, or transfer a monetary instrument or funds from a place outside the United States to or through a place inside the United States with the intent to promote the carrying on of specified unlawful activity, namely, the felonious distribution of listed chemicals, namely acetic anhydride, in violation of Title 21, United States Code, Sections 841(c) and 846 and in violation of the Chemical Diversion and Trafficking Act of 1988; and the smuggling of firearms, ammunition, and magazines controlled under regulations under the Export Administration Regulations listed at 15 Code of Federal Regulations Parts 730-774 contrary to Title 18, United

All in violation of Title 18, United States Code, Section 1956(h).

#### **Count Two**

On or about February 8, 2022 through March of 2024, in the Southern District of Texas and within the jurisdiction of the Court, defendants,



did knowingly and intentionally conspire to possess with the intent to distribute a listed chemical, namely more than 33 kilograms or more of acetic anhydride, a List II Chemical, knowing, or having reasonable cause to believe that the listed chemical will be used to manufacture a controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(c), and 2.

#### **Count Three**

From on or about April 3, 2023 through at least April 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 90,000 rounds of 7.62x39mm caliber ammunition; 30,000 rounds of .223 caliber ammunition; and 1,000 AK-47 firearm magazines, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

## **Count Four**

From on or about June 29, 2023 through at least November 28, 2023, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 40,000 rounds of 7.62x39mm caliber ammunition and 10,000 rounds of .223 caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

A TRUE BILL

**FOREPERSON** 

ALAMDAR S. HAMDANI UNITED STATES ATTORNEY

ASSISTANT UNITED STATES ATTORNEY